

LAWRENCE HINKLE (SBN 180551)
lhinkle@sandersroberts.com
STEPHANIE JONES NOJIMA (SBN 178453)
sjonesnojima@sandersroberts.com
SANDERS ROBERTS LLP
1055 West 7th Street, Suite 3200
Los Angeles, CA 90017
Telephone: (213) 426-5000
Facsimile: (213) 234-4581

Attorneys for Plaintiffs and Counterclaim
Defendants
**HIDDEN EMPIRE HOLDINGS, LLC;
HYPER ENGINE, LLC; DEON
TAYLOR; AND THIRD-PARTY
DEFENDANT ROXANNE TAYLOR**

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

HIDDEN EMPIRE HOLDINGS, LLC;
a Delaware limited liability company;
HYPER ENGINE, LLC; a California
limited liability company; DEON
TAYLOR, an individual,

Plaintiffs,

v.

DARRICK ANGELONE, an individual;
AONE CREATIVE LLC, formerly
known as AONE ENTERTAINMENT
LLC, a Florida limited liability
company; ON CHAIN INNOVATIONS
LLC, a Florida limited liability
company,

Defendants.

DARRICK ANGELONE, an individual;
AONE CREATIVE LLC, formerly
known as AONE ENTERTAINMENT
LLC, a Florida limited liability
company; ON CHAIN INNOVATIONS
LLC, a Florida limited liability
company

Counterclaimants,

CASE NO. 2:22-cv-06515-MWF-AGR

Assigned for all purposes to the
Honorable Judge Michael W. Fitzgerald

**DECLARATION OF ERIN BURKE
IN SUPPORT OF PLAINTIFFS'
MOTION FOR ORDER TO SHOW
CAUSE WHY SANCTIONS
SHOULD NOT BE IMPOSED
AGAINST DEFENDANTS FOR (1)
VIOLATING COURT ORDER
[CONTEMPT] AND (2)
SPOILIATION OF EVIDENCE**

[Submitted concurrently with Notice of
Motion and Motion; Compendium of
Evidence; Request for Judicial Notice;
Declarations of Alex Izen, Roxanne
Avent Taylor, and Lawrence C. Hinkle,
II; and [Proposed] Order]

Date: March 4, 2024
Time: 10:00 a.m.
Courtroom: 5A



1 HIDDEN EMPIRE HOLDINGS, LLC;
2 a Delaware limited liability company;
3 HYPER ENGINE, LLC; a California
4 limited liability company; DEON
5 TAYLOR, an individual,

6 Counterclaim
7 Defendants,

8 DARRICK ANGELONE, an individual;
9 AONE CREATIVE LLC, formerly
10 known as AONE ENTERTAINMENT
11 LLC, a Florida limited liability
12 company; ON CHAIN INNOVATIONS
13 LLC, a Florida limited liability
14 company,

15 Third-Party Plaintiffs,

16 v.

17 ROXANNE TAYLOR, an individual,

18 Third-Party Defendant



DECLARATION OF ERIN BURKE

I, Erin Burke, declare as follows:

1. I am over the age of 18 years and am employed as a Director in cybersecurity practice at FTI Consulting, Inc. (“FTI”), a business consultancy firm that specializes in corporate finance and restructuring, economic consulting, forensic and litigation consulting, strategic communications and technology. I have been employed by FTI since July 2022. I have personal knowledge of the following facts and could, and would, competently testify thereto if called as a witness. I make this Declaration in support of Plaintiffs’ Motion to Hold Defendants in Contempt and Order to Show Cause Re: (1) Violation of Preliminary Injunction, and (2) Spoliation of Evidence (“Motion”).

I. BACKGROUND

A. Professional Experience and Qualifications

2. I have 14 years of professional experience in law and program management, including five years of cybersecurity experience in confidential and complex criminal and regulatory cyber security investigations, specifically in insider threats and digital assets and currency, and maturing enterprise security programs. Prior to joining FTI, I led enterprise-level criminal and national security cyber investigations at the Federal Bureau of Investigations (“FBI”) in Los Angeles, including investigations of malicious-cyber actors, for approximately four- and one-half years from January 2018 to May 2022. Prior to joining the FBI, I was Assistant Dean at Fordham University from 2010 through mid-2016. At different points during that time, I was also Adjunct Faculty in the Computer Sciences Department at Fordham University. I clerked and practiced law in New York and New Jersey in securities and arbitration matters for approximately two years from 2008 to 2010.

3. Global Information Assurance Certification (“GIAC”) is an information security certification entity that specializes in technical and practical certification, and I have held GIAC certifications in Linux hardening, incident handling, and





1 penetration testing. I hold a CISSP (Certified Information Systems Security
2 Professional) certification, granted by the International Information System Security
3 Certification Consortium (“ISC2”). I hold undergraduate and graduate degrees in law
4 (Juris Doctor) and computer science (Master of Science) both from Fordham
5 University.

6 4. Collectively, the FTI cybersecurity team I work with has a law
7 enforcement background and experience in national and international security, fraud
8 detection, incident response, crisis management and disaster recovery, and digital and
9 online forensic investigations.

10 5. My experience includes work and investigations involving Google
11 applications and services, and the Instagram and Twitter platforms. Specifically, in
12 my investigative capacity while I was at the FBI, I regularly prepared and served
13 subpoenas upon Google and social media platforms, including Instagram and Twitter,
14 and analyzed returns received in response to the subpoenas. Additionally, I have
15 experience investigating and working within Google’s Workspace infrastructure of
16 enterprise tools and services based on advisory work I provide to clients in the
17 corporate environment.

18 **B. Investigations and Forensic Work Performed in the Present Action**

19 6. In approximately September 2022, FTI was retained by counsel for
20 Plaintiff Hidden Empire Holdings, LLC (“HEFG”). On or about October 3, 2022, FTI
21 was informed of the Preliminary Injunction entered in this action, signed by the
22 Honorable Michael W. Fitzgerald, dated September 30, 2022 (“Preliminary
23 Injunction”), and was asked by HEFG and its counsel to coordinate and assist in the
24 transfer of the assets described in and required by the Preliminary Injunction to HEFG
25 from Defendants Darrick Angelone (“Angelone”) and AOne Creative LLC, formerly
26 known as Aone Entertainment, LLC.

27 7. Among other things, I learned through my communications with HEFG
28 representatives and its counsel that Angelone had provided services to HEFG for



1 approximately a decade that included development and maintenance of digital
2 content, social media marketing, and acquisition and maintenance of HEFG’s website
3 domains. Counsel requested FTI to assist with expeditiously and accurately
4 transferring online assets identified in the Preliminary Injunction to HEFG and to act
5 as a knowledgeable intermediary between HEFG and Angelone to facilitate the
6 process. I was the primary person from FTI responsible for communicating with
7 Angelone about this endeavor.

8 8. During FTI’s assistance with seeking to obtain Angelone’s compliance
9 with the Preliminary Injunction, I and other members of my team at FTI: (1)
10 conducted interviews of HEFG co-founder and executive, Roxanne Avent Taylor (“R.
11 Taylor”), and other HEFG personnel such as her husband, HEFG co-founder and
12 executive Deon Taylor; (2) conducted interviews of Angelone to understand context
13 about the various matters pertinent to the transfer of HEFG’s assets and to obtain his
14 compliance with the Preliminary Injunction; (3) exchanged emails with R. Taylor and
15 Angelone regarding the status of Angelone’s compliance with the Preliminary
16 Injunction and his efforts to transfer HEFG’s assets; (4) reviewed and observed HEFG
17 account information and other documents related to the efforts to transfer the assets
18 to HEFG; and (5) reviewed legal process returns provided by various service
19 providers (e.g., Google, Namecheap, Charter Communications, Twitter) in response
20 to subpoenas served by HEFG.

21 9. More specifically, my work included the following activities since the
22 issuance of the Preliminary Injunction:

23 a. I exchanged multiple emails with Angelone regarding the status
24 and transfer of assets including: (1) tracking and inventorying
25 information from Angelone concerning the assets; (2) identifying
26 and creating Uniform Resource Locator (“URL”) lists of social
27 media handles maintained by Angelone; (3) investigating the
28 status of HEFG’s Google Workspace account and reviewing



1 correspondence with Google regarding same; (4) investigating the
2 status of the transfer of HEFG's domains; (5) exchanging
3 correspondence with Angelone regarding the transfer of HEFG's
4 social media credentials; and (6) exchanging correspondence with
5 Angelone regarding the transfer of HEFG's Google Workspace
6 account.

7 b. I had multiple communications (calls and emails) with Angelone
8 regarding the above-described issues to follow-up on, and clarify,
9 the status of the transfer of assets, and to try to facilitate and verify
10 the transfer of all pertinent assets to HEFG.

11 c. I engaged in multiple telephone calls and exchanged email
12 correspondence with R. Taylor to investigate the challenges and
13 apparent resistance HEFG faced from Angelone concerning
14 transferring certain of the assets including: (i) inventorying and
15 reconciling domains (including the Nine Icelandic Domains)
16 Angelone claimed were either inactive or are not within his
17 control; and (ii) addressing the receipt of failed or incomplete
18 social media credentials provided by Angelone; (iii) addressing
19 HEFG's inability to access its Google Workspace account, the
20 deletion of said account on or about October 10, 2022, attempts
21 by HEFG to recover the contents of said account (e.g., HEFG's
22 historical emails) after it was deleted, and efforts to determine how
23 the account was deleted.

24 d. I reviewed correspondence between R. Taylor and Google
25 concerning: (i) HEFG's attempts to access its Google Workspace
26 account; (ii) Google's two-step verification process for changing
27 the administrator of an account from one person to another; (iii)
28 the deletion of HEFG's Google Workspace account; and (iv)



1 HEFG's unsuccessful attempts to recover that account and its
2 contents.

3 e. I also reviewed the returns produced by third parties in response
4 to subpoenas served by HEFG seeking records related to
5 Angelone's failure to comply with the Preliminary Injunction.
6 Specifically, I have reviewed returns related to subpoenas served
7 on Google, Twitter (rebranded as "X"), Instagram, Namecheap,
8 and Charter Communications. These returns and the other
9 Exhibits I reference in this Declaration are attached to the
10 Compendium of Evidence filed by Plaintiffs as part of their
11 moving papers.

12 f. I reviewed various pleadings filed in this litigation and documents
13 attached to them including, for example, the Complaint,
14 Preliminary Injunction, and Declarations filed by the parties.

15 10. The opinions and conclusions in this Declaration are based upon my
16 experience as a cybersecurity and forensic investigator and the above-described work
17 I and other members of my FTI team performed. In the course of my work, and
18 consistent with my expertise and experience, I made several findings concerning the
19 HEFG assets covered by the Preliminary Injunction. As explained in more detail
20 below, I made the following conclusions: (1) the evidence indicates that instead of
21 transferring HEFG's Google Workspace account to HEFG, Angelone apparently
22 deleted the account which destroyed all of HEFG's emails, data, and records stored
23 and maintained in that account, (2) the evidence indicates that instead of transferring
24 the nine HEFG domains to HEFG (i.e., the Islandic Domains), Angelone registered,
25 or caused to be registered, those domains for himself using what we understand to be
26 an alias, "Jacky Jasper," he has used for several years, and (3) Angelone either failed
27 to transfer and/or interfered with the transfer of HEFG's two most prolific and
28 valuable social media accounts, specifically its Instagram and Twitter accounts.

II. DESCRIPTION OF ASSETS THAT ARE AT ISSUE

11. The assets in the Preliminary Injunction we understand to be at issue in the Motion can be grouped into the following categories: (1) HEFG's Google Workspace account, (2) HEFG's nine domains, and (3) HEFG's Instagram and Twitter accounts.

A. HEFG's Google Workspace Account

12. Google Workspace is a collection of productivity tools offered by Google. Many companies use Google Workspace as a solution for company email, file storage on Google Drive, calendaring, task management, word processing using Google Docs (similar to Microsoft Word), creating financial spreadsheets using Google Sheets (similar to Microsoft Excel), and other functions. Those are many of the most common functions a business desires when it creates and maintains a Google Workspace account.

13. When signing up for a Google Workspace account, a business owner enters the business' domain name to use with the Google Workspace account. In the account creation process, Google does not take the applicant's word that the applicant owns the domain name sought to be used for the Google Workspace account. Rather, Google has an automated procedure for a Google Workspace registrant to demonstrate the registrant's ownership of the domain name it seeks to use for its Workspace account. Once the account is created, a registrant can then create various "user accounts" within the newly formed Google Workspace account for each of its users (e.g., employees and consultants) to send and receive email. For example, if HEFG created an account using the *hiddenempirefilmgroup.com* domain it owns, HEFG could then create a user account for one of its employees (e.g., John Doe) under that domain (e.g., *JohnDoe@hiddenempirefilmgroup.com*) that could then be used by that employee to send and receive email. In this case, HEFG's Google Workspace account was created and maintained using the domain *hiddenempirefilmgroup.com*. Domain names are described more fully below.



B. Domain Names

14. For a modern business to have a presence on the internet – that is, for example, to have a website or use a professional, custom email address – it must purchase a domain name that gets hosted. A domain name is the method by which something on the internet can be contacted in a human-friendly way. For example, by typing in the domain name *hiddenempirefilmgroup.com* in a web browser, one can view the website for HEFG. Additionally, one can correspond over the internet by sending an email to an email address such as *office@hiddenempirefilmgroup.com*.

15. Domain names may be purchased from various companies who sell them, and they must be renewed periodically for continuous use. The purchase of a domain name alone does not instantly result in an internet-accessible website or email; the purchase simply means the domain name has been made unavailable for others to use. In fact, domain names are commonly purchased simply to be owned and protected from others' malicious or deceiving, or unintentionally confusing, use, and not necessarily to be functional.

16. To be functional and accessible by the internet, a domain name must be hosted, meaning, in the case of a website, that the files of code and graphics are stored on an internet-connected computer, called a server. Because maintaining a server entails technical knowledge and attention, many businesses opt to use a hosting provider, who effectively rents its server space for companies to use to host their domain name and related content.

17. The Internet Corporation for Assigned Names and Numbers (ICANN) is a not-for-profit public/private partnership that plays a significant role in the stable functioning of our global internet, specifically by coordinating the Internet's naming system. As an example, ICANN coordinates the Internet's domain name system, as discussed in this declaration, whereby human friendly domain names, purchased for use from registrars, map to IP addresses on the internet. ICANN specifically coordinates contracts with registries, and coordinates and deconflicts the allocation of



1 IP addresses, among ICANN's other responsibilities in this space.

2 18. Among these additional responsibilities is maintenance of the WHOIS
3 database. WHOIS is a database that stores the registrant information, such as name,
4 address, phone number, and email address, for a domain name, and IP address block.
5 This transparency of registrant information allows for accountability and
6 investigation of domain or IP ownership.

7
8 19. All internet connected computers are reachable through IP addresses.
9 Hosting providers will facilitate Domain Name System ("DNS") services, which map
10 a domain name to an IP address, allowing the end user to visit websites and send email
11 in a human friendly way.

12 20. To put it all together, based on my investigation the domain
13 *hiddenempirefilmgroup.com* is hosted by the hosting provider called Namecheap,
14 who has assigned it the IP address 162.255.119.166.¹ Hiddenempirefilmgroup.com
15 is both a functional website and an email domain, and no one needs to know its IP
16 address to see the website or send email.

17 **C. Social Media Accounts**

18 21. As a media production company, HEFG had an important presence on
19 Instagram, Twitter, YouTube, and Facebook, where it has shared information about
20 upcoming films and promotional events. Specific social media account names,
21 particularly for Instagram and Twitter, are typically referred to as "handles" that
22 follow an "@" sign. In the case of Facebook and YouTube, content is accessible
23 through a business page "URL" such as www.facebook.com/examplebusinessid.

24 **III. ANGELONE APPARENTLY DELETED HEFG'S GOOGLE**
25 **WORKSPACE ACCOUNT**

26 **A. Angelone was the Only Administrator for HEFG's Workspace**

27
28 ¹ IP addresses may change. This IP address was associated with the domain on October 12, 2023.



Account

22. Based on my investigation, the evidence indicates that after the Preliminary Injunction was issued, Angelone apparently deleted HEFG's Google Workspace account when he was the administrator of the account.

23. An administrator is a person on a Google Workspace account with "administrator privileges." A Google Workspace administrator manages the account and is able to take certain actions and make changes that a standard user of an account cannot. For example, an administrator can add and delete accounts, reset passwords, and change settings. The term "super administrator" refers to an administrator that has access to all possible administrator privileges. An administrator that is not a "super administrator" may have access to only certain subsets of the available administrator-related privileges.

24. The original creator of a Google Workspace account becomes the account's first user, and the account's "super administrator." Based on my interviews of R. Taylor and Angelone, and correspondence from Angelone, he originally set up the HEFG Google Workspace account using the hiddenempirefilmgroup.com domain and was engaged by HEFG to be solely responsible for the maintenance of that account. As Angelone was the account's creator, his email address - darrick@hiddenempirefilmgroup.com - was the original "user" of the account that had the privileges of "super administrator." Angelone's role as sole administrator is documented in the Google Return No. 25783578 dated January 25, 2023. (See **Exhibit** 53, p. 53.44 [Google Return]).

25. In the case of HEFG's Google Workspace Account that Angelone was hired to maintain, based on all the information available to me, there was only ever one super administrator, Angelone. In this Declaration, I will simply refer to Angelone's role as "administrator" because Angelone was the only administrator and HEFG as a small company did not have a structure of multiple super administrators or administrators with varying privilege sets.

B. Angelone Failed to Provide to HEFG Critical Information That was Necessary for it to Complete the Transfer of Administrator Credentials for HEFG's Workspace Account

26. R. Taylor's efforts to transfer the administrator privileges from Angelone to her started prior to entry of the Preliminary Injunction. R. Taylor advised me that on or about September 6, 2022, she made an email request to Google to transfer administration of the Google Workspace account from its existing administrator, Angelone, to herself. The fact that R. Taylor's made the request on or about September 6, 2022, is corroborated by two emails Google Workspace Support sent in response to both R. Taylor and Angelone on September 6, 2022. I reviewed both of those emails.

27. The first email is correspondence from Google Workspace Support to Angelone dated September 6, 2022, in which it advised Angelone that "another user is claiming ownership of 'hiddenempirefilmgroup.com. . .'" In response, Google Workspace Support initiated the two-step process (described below) for verifying ownership of the account before it would proceed with the transfer of administrator privileges from Angelone to R. A. Taylor. A true and correct copy of Google's email to Angelone is attached as **Exhibit 5**. In the course of my discussions with Angelone about the transfer of administrator privileges for HEFG's Workspace account Angelone forwarded me a copy of this email.

28. Google Workspace Support sent a similar email on September 6, 2022, to R. Taylor advising that she must complete the ownership verification process before being granted administrator access to the Workspace account. A true and correct copy of Google's email to R. Taylor is attached as **Exhibit 6**.

29. When Google receives a request to change administrators, it does not simply rely on narratives and emails from individuals or users claiming ownership. Instead, Google initiates a "challenge" process to verify ownership of the account. This challenge process entails a two-step ownership verification process where



1 Google requires the requester to prove that he/she: (1) owns the domain used by the
2 Google Workspace account; and (2) has detailed knowledge of the account that only
3 the individual or entity who set up the account would know.

4 30. The first part of this process is satisfied by entering a single line in the
5 domain's configuration, which in HEFG's case would have been entering a text record
6 within the hiddenempirefilmgroup.com domain's DNS settings in Namecheap. The
7 second part of the process requires providing information to Google that only the
8 administrator would know.

9 31. In this instance, Google Workspace Support requested R. Taylor to "try
10 to answer" all of the following questions to satisfy the second part of the verification
11 process, specifying a single answer to each one:

- 12 a. What is the username (username@domain.com) of the Super
13 Administrator account you are trying to access?
- 14 b. When did you last sign in to this Super Administrator account
15 (MM/DD/YYYY)?
- 16 c. What is the original secondary/recovery email address?
- 17 d. Why are you unable to access this secondary/recovery email
18 address?
- 19 e. How many users are on your Google Workspace account?
- 20 f. If you paid with a credit/debit card, provide the following details:
21 (1) When was the last charge for this Google Workspace account
22 (MM/DD/YYYY); (2) How much was your credit/debit card
23 charged?; (3) What type of credit/debit card was charged (e.g.
24 MasterCard, Visa)?; (4) What are the last four digits of this card?;
25 (5) What is the expiration date of this card?; (6) What is the billing
26 address associated with the Google Workspace payment method?;
27 and, (7) If you made the transaction through Google Wallet, what
28 is the order number?



g. Google Workspace requested R. Taylor to answer similar questions about whether HEFG paid for its Workspace subscription using bank transfer or PayPal services. (See Exhibit 6, pp. 6.2-3.)

32. Google advised R. Taylor that once she replied with the answers to the knowledge questions, Google would review the answers and proceed if account ownership was confirmed. (*Id.* at p. 6.3.)

33. According to the Google Return, it appears that on or about September 6, 2023, when R. Taylor sent her request to Google to remove Angelone as administrator and make her the administrator, Google sent Angelone an email advising that it had (1) temporarily “demoted” the existing administrator (Angelone) - darrick@hiddenempirefilmgroup.com - and; (b) sent its “challenge” (i.e., the two-step verification process) to both R. Taylor and Angelone. This is reflected in the Google Return as follows:

Changed primary admin from darrick@hiddenempirefilmgroup.com to 40829326@hiddenempirefilmgroup.com 2. Demoted darrick@hiddenempirefilmgroup.com. 3. Disabled temp admin.>=== NEXT STEPS
====Send challenge to both parties

(See Exhibit 53, p. 53.12, and Google Workspace Support’s September 6, 2022, email to Angelone, *supra*, Exhibit 5.)

34. To complete step one of the “challenge” process, it was necessary for Angelone to provide R. Taylor with the required access to manage the domain name hiddenempirefilmgroup.com on the hosting provider, Namecheap. On or about October 4, 2022, I sent an email to Angelone requesting that he transfer the hiddenempirefilmgroup.com domain in Namecheap to R. Taylor at “roxanneavent” so we could proceed with responding to Google’s two-step process to transfer administrator privileges from Angelone to R. Taylor. I also requested in said email that Angelone provide the billing and account information that R. Taylor would need



1 to satisfy the second part of the process. A true and correct copy of my October 4,
2 2022 email to Angelone is attached as **Exhibit 18**.

3 35. In a teleconference with R. Taylor on or about October 5, 2022, she
4 advised me that she had gained access to the hiddenempirefilmgroup.com domain in
5 Namecheap on October 4, 2022, and that she successfully performed step one of
6 Google's verification process on October 5, 2022.

7 36. With respect to step two of the verification process, because R. Taylor
8 did not create or administer the Workspace account, she did not have the ability to
9 answer the aforementioned questions related to the Workspace account's billing
10 information and account recovery. As the creator and administrator of the account,
11 Angelone was solely in possession of that information. Based on an email dated
12 September 7, 2022, that Angelone forwarded to me on October 5, 2022, Angelone
13 replied to Google with the required billing and account recovery information to verify
14 his authority concerning the account. However, because the challenge was sent to both
15 Angelone and R. Taylor, Google would not effect a change in administrators from
16 Angelone to R. Taylor until Angelone provided R. Taylor with the billing information
17 so she could separately respond to Google with the same information. A true and
18 correct copy of Angelone's October 5, 2022, email to me and its attachment (the
19 September 7, 2022, challenge request) is attached as **Exhibit 18**. In that email,
20 Angelone confirmed that if he got administrator credentials to the HEFG Workspace
21 account restored he would be able to transfer those administrator privileges to R.
22 Taylor, stating, "if...the darrick@hiddenempiregroup.com admin privileges are
23 reinstated I can quickly add administrator privileges to Roxanne's account."

24 37. On October 4, 2022, I had asked Angelone to provide the answers to
25 Google's questions for the second step of the two-step verification process related to
26 billing and account recovery. (See **Exhibit 18**, *supra*). However, Angelone replied
27 the next day that he was "*not so comfortable*" providing the information, and that he
28 had already separately provided it to Google "with no success." (Emphasis added).

1 See **Exhibit 18**. R. Taylor never received from Angelone the information she needed
2 to complete that step.

3 38. On October 7, 2022, Google Workspace Support informed R. Taylor
4 that, because she was “not able to prove the ownership of the domain
5 ‘hiddenempirefilmgroup.com’ by answering the knowledge test and by adding
6 CNAME,” the process for changing the administrator had not been completed. A
7 true and correct copy of Workspace Support’s October 7, 2022, email is attached as
8 **Exhibit 10**. According to the Google Return, Angelone was apparently thereafter
9 reinstated as administrator to the Workspace Account, as reflected in the Google
10 Return:

11
12 REVERTING THE DOMAIN TO THE ORIGINAL STATE</p><p>➡ Deleted Temp
13 admin</p><p>➡ Successfully updated Primary Admin from
14 40829326@hiddenempirefilmgroup.com to darrick@hiddenempirefilmgroup.com

15 (**Exhibit 53**, p. 53.19.)

16 39. Based on my review of the correspondence between R. Taylor, Angelone
17 and Google, and my review of the Google Return, it appears that from September 7,
18 2022, onward, Google was specifically waiting for R. Taylor to provide this
19 information so it could continue its investigation and process her request to transfer
20 administrator rights from Angelone to R. Taylor. Due to Angelone’s refusal to provide
21 R. Taylor or me with the information needed for the second step of the “challenge”
22 process, R. Taylor could not submit the information to Google that it required to make
23 R. Taylor the account administrator. This failure to prove ownership was
24 communicated by Google to R. Taylor on October 7, 2022. As an apparent result, as
25 noted above, the Google return indicates Google “reverted” the account to Angelone
26 and he again was the super administrator of the account. Rather than transferring
27 administrative privileges to R. Taylor as he indicated he would do in his October 5,
28 2022 email to me in the event his administrator privileges were restored, he apparently
deleted the entirety of HEFG’s Workspace account.



1 **C. Deletion of HEFG’s Workspace Account on October 10, 2022**

2 40. On October 10, 2022, R. Taylor advised me that all of the information in
3 HEFG’s Google Workspace account had been deleted. As explained below, the
4 Google Return and correspondence from Google Workspace Support to R. Taylor
5 show that Google reinstated Angelone’s administrator privileges which were used to
6 delete HEFG’s Google Workspace account on October 10, 2022. (**Exhibits 14-16,**
7 *post.*)

8 41. In the weeks following October 10, 2022, R. Taylor communicated with
9 Google Workspace Support account recovery team in an attempt to recover HEFG’s
10 deleted account and all its contents but was advised by Google that the account and
11 its contents (including all of HEFG’s historical emails and records) could not be
12 recovered. Correspondence from Google Workspace Support confirms that the prior
13 administrator (Angelone) deleted the account and that it could not be recovered:

- 14 • October 27, 2022: “Since the deletion has been performed by the existing
15 admin in workspace...” A true and correct copy of this email to R.
16 Taylor, which she forwarded to me, is attached as **Exhibit 14.**
- 17 • November 1, 2022: “Please be informed that the deletion of *old account*
18 was performed by the *existing super administrator* and *only*
19 *administrator can delete the account* because administrator has the all
20 (sic) control over the Google workspace but not any user hence I would
21 suggest you to be in touch with the *existing/old admin of the previously*
22 *deleted Google workspace* account with the domain
23 *hiddenempirefilmgroup.com.*” (Emphases added). A true and correct
24 copy of the November 1, 2022, correspondence from Google
25 Workspace, which R. Taylor forwarded to me, is attached as **Exhibit 15.**
- 26 • November 8, 2022: “According to your other opened case 40829326 you
27 were informed that you were not able to prove the ownership of the
28 domain ‘hiddenempirefilmgroup.com’ by answering the knowledge test



1 and by adding CNAME. *Therefore changes were reverted to the original*
2 *state* prior to sending proof of ownership request to both parties (namely
3 you as requester and the rogue admin). Once this account was reverted
4 the admin deleted domain and domain was released and according to my
5 tools can see that you signed up for new domain later on the same date
6 10/OCT/2022.” (Emphasis added) A true and correct copy of the
7 November 8, 2022, correspondence from Google Workspace, which R.
8 Taylor forwarded to me, is attached as **Exhibit 16**.

9 42. All the information available to me indicates Angelone was the person
10 who deleted HEFG’s historical Google Workspace account because no one except for
11 Angelone had ever been an administrator on the account and only an administrator
12 has the ability to delete an account. This is confirmed by Angelone himself in his
13 declaration filed with this Court on or about September 28, 2022, in which he stated
14 that:

15 “Roxanne has never had administrator privileges and needed to contact
16 me or someone at Aone in order to create, delete or update email
17 accounts.”

18 (Dkt. 23-1, ¶ 12). No records I have seen even suggest R. Taylor ever obtained
19 administrator access up through, and including, October 10, 2022, when the old
20 account was deleted.

21 43. In addition, in approximately April 2023, after HEFG’s new Google
22 Workspace account was created, I accessed audit logs within the admin console for
23 the account. Audit logs provide a record of actions performed within a given Google
24 admin console.² The audit logs within the Google admin console show a record of
25 activity conducted by the administrator(s) of an account.

26
27 ² In my experience conducting log review and analysis, log times should be considered as
28 approximations due to considerations including but not limited to processing or lag times, as further
detailed by Google at <https://support.google.com/a/answer/7061566?hl=en>.



44. When I accessed the audit logs for HEFG's Google Workspace account, I saw the record of activity for that account as well as what appeared to be a few historical snippets from the prior account.³ The audit logs show that the following IP address was logged onto HEFG's Google Workspace account when R. Taylor's account was disabled: 2603:8000:df00:988f:90b8:f0ce:ab97:3f8d, 2022-10-10T19:32:32-07:00. An IP address is the address identifying the source or destination of a computer sending or receiving traffic on the internet. The IP address can be tied to a specific individual. This can be done by contacting the IP address provider who maintains records identifying the individual subscriber that used a particular IP address at a given point in time.

45. As the oldest two records from the audit logs originated from Angelone's IP address (including the record evidencing the disabling of R. Taylor's user account), it appears he used administrator credentials to disable R. Taylor's account on October 10, 2022, the same day the entire Workspace account was deleted and while Angelone was the sole administrator. A true and correct screenshot of the admin console and audit logs is below and attached as **Exhibit 19**.

Date	Description	Login type	IP address
2022-10-11T09:33:01-07:00	Roxanne Taylor logged in	Google password	108.184.95.212
2022-10-10T21:27:46-07:00	Roxanne Taylor logged in	Google password	2600:387f:571b:0:0:0:a
2022-10-10T20:41:30-07:00	Roxanne Taylor logged in	Re-auth	2600:387f:571b:0:0:0:a
2022-10-10T20:36:58-07:00	Roxanne Taylor logged in	Re-auth	2600:387f:571b:0:0:0:a
2022-10-10T20:35:49-07:00	Roxanne Taylor has changed Account password		2600:387f:571b:0:0:0:a
2022-10-10T20:35:16-07:00	Roxanne Taylor logged in	Google password	2600:387f:571b:0:0:0:a
2022-10-10T20:35:16-07:00	Roxanne Taylor was presented with login verification	Google password	2600:387f:571b:0:0:0:a
2022-10-10T20:34:46-07:00	Roxanne Taylor was presented with login verification	Google password	2600:387f:571b:0:0:0:a
2022-10-10T20:34:37-07:00	Roxanne Taylor was presented with login verification	Google password	2600:387f:571b:0:0:0:a
2022-10-10T20:34:34-07:00	Roxanne Taylor was presented with login verification	Google password	2600:387f:571b:0:0:0:a
2022-10-10T20:33:40-07:00	Roxanne Taylor failed to login	Unknown	2600:387f:571b:0:0:0:a
2022-10-10T19:33:36-07:00	Roxanne Taylor failed to login	Google password	2603:8000:df00:988f:90b8:f0ce:ab97:3f8d
2022-10-10T19:32:32-07:00	Account roxanne@hiddenempirefilmgroup.com disabled		2603:8000:df00:988f:90b8:f0ce:ab97:3f8d



1 46. The above screenshot of the audit logs, specifically the description on
2 the last entry, states: Roxanne[[@hiddenempirefilmgroup.com](#)] disabled. Next to that,
3 it identifies the corresponding IP address (for Angelone) that executed that particular
4 action.

5 47. The fact that IP address 2603:8000:df00:988f:90b8:f0ce:ab97:3f8d
6 belongs to Angelone was confirmed through a subpoena served by HEFG on Charter
7 Communications (“Charter”), the Internet Service Provider assigning this particular
8 IP address. The documents produced by Charter identified the subscriber as “Evonne
9 Zummo,” who is Angelone’s mother, and the subscriber location as 2529 Griffith Park
10 Blvd., Los Angeles, CA 90039, which is Angelone’s residence. Additionally, the User
11 Name for the subscriber identifies two email accounts associated with Angelone:
12 [aoneent@twc.com](#) and [darrick.aone@gmail.com](#). A true and correct copy of the
13 Charter Return is attached as **Exhibit 60**.

14 48. The information in the audit logs corroborates that Angelone had the
15 administrator access and the ability to delete the Workspace Account as identified in
16 Google’s return. This deletion of the Workspace account resulted in the loss of all of
17 the historical information contained within or connected to HEFG’s Google
18 Workspace account. As Angelone was the sole administrator of the HEFG Google
19 Workspace account and used his administrator credentials to deny R. Taylor access
20 to the account on October 10, 2022, based on the information available to me, he had
21 to be the person that also deleted the entire HEFG Workspace account before R.
22 Taylor was able to login to the new HEFG Google Workspace account.

23 **D. After the Deletion of HEFG’s Workspace Account, Google Initiated**
24 **a New Account for HEFG**

25 49. In our efforts to work with Angelone to facilitate the transfer of the
26 [hiddenempirefilmgroup.com](#) Google Workspace account to R. Taylor, our
27 expectation was that Angelone would cooperate with completing Google’s two-step
28 verification process, and that R. Taylor would replace him as administrator *on the*



1 *existing account*. Our expectation is based on industry custom and practice in
2 *preserving* (not destroying) a business’s historical records, files, emails, and data
3 when management of an account changes. Based on my experience, it is highly
4 unusual – and indeed improper – for a person who has been entrusted with
5 administrator privileges to wholesale destroy a business’s records by deleting the
6 account for which those privileges had been granted.

7 50. Therefore, we were surprised on October 10, 2022, when R. Taylor
8 received an email from Google with a link for a “free trial” for a *new* Google
9 Workspace account for hiddenempirefilmgroup.com. A true and correct copy of the
10 October 10, 2022, email from Google, which R. Taylor forwarded to me, is attached
11 as **Exhibit 11**. When R. Taylor accessed the “free trial” link for
12 hiddenempirefilmgroup.com, there were no historical HEFG records, files, or emails.

13 51. Receiving a link for a “free trial” on October 10, 2022, is what led R.
14 Taylor, in coordination with me and my team at FTI, to repeatedly seek assistance
15 from Google Workspace Support to try to recover the old account and all the historical
16 records maintained in the account. However, as set forth more fully above, R. Taylor
17 was unable to recover “the previously deleted Google workspace.” (See, e.g.,
18 paragraph 41 above, and emails from Google attached as **Exhibits 14-16**. Although
19 HEFG could now use hiddenempirefilmgroup.com domain for Google Workspace
20 service, it was for a completely new account that did not contain any of the historical
21 records, files and emails stored and maintained in the old account prior to October 10,
22 2022.

23 **IV. ANGELONE REGISTERED THE NINE HEFG “ICELANDIC”**
24 **DOMAINS USING THE PSEUDONYM “JACKY JASPER” AND**
25 **REFUSED TO TRANSFER THEM TO HEFG**

26 52. Among the domains identified in the Preliminary Injunction that
27 Angelone was required to transfer to HEFG were the following “Icelandic Domains.”
28 (Dkt. No. 26, p. 2).

- Hiddenempiremediagroup.com
- Hiddenempiremedia.com
- Hiddenempirereleasing.com
- Hiddenempireproductions.com
- Hiddenempire.productions
- Hiddenempire.media
- Hiddenempiremedia.group
- Hiddenempire.studio
- Hiddenempire.org

53. To date, Angelone has not transferred the domains to HEFG. Rather, he has claimed to be unable to transfer the domains on the grounds that he does not own or control them. For example, in an email to me dated October 4, 2022, Angelone wrote that the Icelandic domains were:

“registered in Aug 2021, not used by HEFG not billed to or paid for and allowed to expire last month. They are currently not held in our namecheap account preventing me from being able to transfer/provide access as ordered. We are still investigating this and would welcome any feedback or help if you have tracked anything in their regards.”

A true and correct copy of Angelone’s October 4, 2022, email is attached as **Exhibit 17**.

54. On October 5, 2022, Angelone wrote in another email to me that: “these were registered by hefg to consider using as expressed when registration had been communicated. But there is no record of them wanting to use, them being billed for or them paying for these domains which we let expire in August. Again, not sure how to show that these are not held in our domain registry. We made the who.is info open on all the disputed domains we do have control over. Your expertise would be appreciated on this. Thank you.”



1 A true and correct copy of Angelone's October 5, 2022, email is attached as **Exhibit**
2 **21.**

3 55. On October 13, 2022, Angelone told me in another email that he found
4 out more about the Icelandic domains:

5 "After contacting the address shown on the privacy guard requesting
6 details about the current registered owner, we have determined that a
7 company who we are familiar with and who routinely registers domains
8 recently expired from us and other vendors, registered these domains and
9 a score of others that had expired recently and are not subject of this
10 litigation. I nor AOne have any interest in this company and have no way
11 to force them to transfer the domains to AOne or to HEFG. Please let me
12 know if I can provide further assistance. Thank you."

13 A true and correct copy of Angelone's October 13, 2022, email is attached as **Exhibit**
14 **22.**

15 56. When Angelone was asked by me on October 13, 2022 to provide his
16 email outreach for my review, Angelone said in that same email:

17 "Contact was made to privacy email via a 3rd party that handles some
18 tech related things for me, and he is based in Croatia. Otherwise, I am
19 waiting to speak to them, and when I do I will request that an email be
20 sent to me confirming/detailing their ownership. As much as I hope to
21 achieve this, I have some worry they might not want to be dragged into
22 litigation over a domain they properly registered. It is a priority for me
23 though."

24 (*Id.*)

25 57. All of the foregoing statements appeared designed to try to convince me
26 that Angelone could not comply with the Preliminary Injunction because he had no
27 interest in, or control over, the Icelandic Domains.

28 58. Angelone repeated his statements to the Court when he wrote in his





1 Declaration filed on or about October 13, 2022, that:

2 “After investigating who the new owners of the domains are, we
3 discovered that they were registered by a 3rd party we are familiar with
4 and who routinely registers domains that AOne and other resellers allow
5 to expire on Namecheap. We have no interest in this 3rd party business .
6 . . [and] Because we have no interest in the company who purchased
7 them, we are not able to transfer ownership to HEFG.”

8 (Dkt. 28-2, ¶ 40.)

9 59. Based on evidence I have reviewed, Angelone’s statements appear to be
10 untrue. Counsel for HEFG subpoenaed records from Namecheap, the hosting provider
11 for these domains. The Namecheap Return included information showing that those
12 nine domains were registered by Angelone using one of his aliases, “Jacky Jasper,”
13 with the email address of “jackyjasper@gmail.com” on or about August 6, 2021, and
14 contrary to Angelone’s representations they did not expire in August 2022, because
15 there are no entries indicating any account transfers and/or domain expirations in
16 2022. A true and correct copy of the Namecheap return is attached as **Exhibit 58**; see
17 pp. 58.13-15 to that Exhibit).

18 60. Upon receiving the Namecheap Return, I consulted the WHOIS database
19 for further details on account activity for the Icelandic Domains. True and correct
20 copies of screenshots of the WHOIS histories for each of the Icelandic Domains are
21 collectively attached as **Exhibit 23**. Each of those histories indicates that the
22 corresponding domain was not allowed to expire but was instead renewed in early
23 July, 2022. This is confirmed by the Namecheap Return, where the “Auto-Renew”
24 box was checked for each of the Icelandic Domains.

25 61. Part of Namecheap’s production is a Domain List that appears to
26 identify each of the domains registered in the “Jacky Jasper” Namecheap account.
27 (**Exhibit 58**, pp. 58.13-15.) During my review of the Namecheap Return I noticed that
28 “Jacky Jasper” also registered a domain named aventviii.com in this Namecheap



1 account on February 7, 2021. I recognized the name of that domain because during
2 the asset recovery process R. Taylor told me that she had asked Angelone to secure
3 that domain for her and wanted it back as part of the domain transfer process. As
4 evidenced by an October 14, 2022, email, Angelone acknowledged that he had control
5 over the aventviii.com domain, but he refused to share administrator control because
6 he said it was not part of the Injunction Order. A true and correct copy of Angelone's
7 October 14, 2022 email is attached as **Exhibit 24**.

8 62. Ultimately, Angelone did agree to share administrative control of the
9 aventviii.com domain with R. Taylor, as reflected in a November 22, 2022 email he
10 sent me with the subject line "aventviii.com access control." A true and correct copy
11 of Angelone's November 22, 2022 email is attached as **Exhibit 24**. Angelone would
12 not have been able to provide shared administrator control over the aventviii.com
13 domain unless he had the ability to both access and control the "Jacky Jasper"
14 Namecheap account where the aventviii.com domain and the Nine Icelandic Domains
15 were all held.

16 63. In addition, the Namecheap and Google Returns indicate that someone
17 using the IP address 76.93.225.102 (an IP address assigned by Charter in the Los
18 Angeles area), logged into both the "Jacky Jasper" Namecheap account and
19 Angelone's darrick@hiddenempirefilmgroup.com HEFG Workspace account.
20 Specifically, that IP address was used to log into the "Jacky Jasper" Namecheap
21 account on August 17, 2022 and to log into the darrick@hiddenempirefilmgroup.com
22 HEFG Google Workspace account on August 13, 2022, August 5, 2022, August 2,
23 2022, and June 5, 2022. See **Exhibit 53**, pp. 53.40-43(Google Workspace); **Exhibit**
24 **58**, p.58.12 (Namecheap).

25 64. According to the Declaration of Alex Izen, my colleague at FTI,
26 Angelone has a well-documented history of using the name "Jacky Jasper" as an alias
27 for himself. His connection with the name "Jacky Jasper" is set forth in detail in the
28 Declaration of Alex Izen filed in support of this Motion.

65. Therefore, I have concluded that Angelone's representations that he could not comply with the Preliminary Injunction and transfer the Nine Icelandic Domains to HEFG because he does not have control over, or an interest in, those domains was untrue.

V. ANGELONE FAILED TO TRANSFER OR OTHERWISE INTERFERED WITH THE TRANSFER OF HEFG'S TWITTER AND INSTAGRAM ACCOUNTS

A. Twitter Account

66. Angelone did not successfully transfer two social media accounts, which accordingly to R. Taylor were the two most important to HEFG's business and branding, specifically: Twitter @hiddenempirefg, and Instagram @hiddenempirefilmgroup.

67. HEFG's counsel subpoenaed records from Twitter regarding HEFG's Twitter account. The Twitter Return included information showing that the historical account was deleted on November 4, 2022 and HEFG's Twitter handle was transferred to "Jacky Jasper," the same alias of Angelone that is associated with the Nine Icelandic Domains, on January 12, 2023. See **Exhibit 56**, pp. 56.4, 56.9. The Twitter return further revealed that IP address 76.167.147.254 was used to login to the Twitter account, the darrick@hiddenempirefilmgroup.com Workspace account and the "Jacky Jasper" Namecheap account containing the Icelandic Domains. See **Exhibit 56**, p. 56.6 (Twitter); **Exhibit 58**, p. 58.12 (Namecheap), **Exhibit 53**, p. 53.40 (Google Workspace). This IP address is a Los Angeles-based IP address provided by Spectrum. A true and correct copy of the Twitter Return is attached as **Exhibit 56**.

68. On October 5, 2022, I sent an email to Angelone and requested, among other things, that he prioritize transferring the social media accounts, including HEFG's Twitter @hiddenempirefg account and HEFG's @hiddenempirefilmgroup Instagram account. Angelone replied on October 5, 2022, and specifically regarding the @hiddenempirefg Twitter account, stated that the account had been suspended for



1 copyright issues. A true and correct copy of the email thread with my request and
2 Angelone's reply is attached as **Exhibit 26**.

3 69. On October 7, 2022, and October 11, 2022, I emailed Angelone and
4 asked him to produce the suspension notification from Twitter. A true and correct
5 copy of the email thread between Angelone and me is attached as **Exhibit 27**. Exhibit
6 27 includes Angelone's October 11, 2022, email in which he stated he was not aware
7 of any notification from Twitter and provided the following screenshot:



19 70. When I asked Angelone for the password to the account on the same day,
20 he sent a password that was invalid. Also on the same date, I sent a follow-up email
21 to which Angelone answered: "Try a reset. It's been a long time (**Exhibit 27**, p. 27.2).
22 A lot of these accounts were not active or had bots/automation posting." However, I
23 could not conduct a password reset because Angelone would not provide a valid email
24 or phone number connected with the account.

25 71. Meanwhile, a separate team within FTI had been retained to monitor
26 HEFG's social media accounts, parallel to my work trying to facilitate the account
27 transfers. My colleague at FTI, Alex Izen, was a member of that team. The work by
28



1 that team revealed that Angelone apparently took over HEFG’s twitter account and
2 changed the handle to @darrickdidit before deleting the account.

3 72. Based upon the Twitter Return, HEFG’s Twitter account was
4 misappropriated on January 12, 2023, by the “Jacky Jasper” alias used by Angelone.
5 The account associated with the username and handle @hiddenempirefg showed a
6 creation date 2023-01-12T00:41:10.121Z with the email address
7 jacky.jasper@gmail.com. (See Twitter return, **Exhibit 56**, p. 56.4.)

8 73. A very similar email address, jackyjasper@gmail.com, was used to
9 register the Nine Icelandic domains. And as stated in Paragraph 67, IP address
10 76.167.147.254 was used to login to Angelone’s HEFG Workspace account, the
11 “Jacky Jasper” Namecheap account with aventviii and the Icelandic Domains, and
12 HEFG’s twitter account. See **Exhibit 56**, p. 56.6 (Twitter); **Exhibit 58**, p. 58.12
13 (Namecheap), **Exhibit 53**, p. 53.40 (Google Workspace). This indicates that Angelone
14 had access to, and continued to access the Twitter account, after the Preliminary
15 Injunction Order issued, and did not turn it over.

16 **B. Instagram Account**

17 74. On October 5, 2022, Angelone first provided me with the username and
18 password credentials for the Instagram account. However, the account was protected
19 by “two factor” or “multi factor” authentication (“2FA”) as well. Instagram’s 2FA is
20 a mechanism that is used to protect an account in the event of credential set
21 compromise. For example, when a new device, such as a new computer, logs into an
22 account, the 2FA may be used to “verify” that this new device is permitted to access
23 the account.

24 75. The 2FA process requires that in addition to inputting a username and
25 password, one must receive and input a confirmation code to gain access to the
26 account. Typically, in order to get the confirmation code, the 2FA process requires
27 input of an email address, a cell phone number, or use of an authenticator app.

28 76. In the case of the HEFG Instagram account, when I attempted to test the



1 username and password provided by Angelone, it was met with the 2FA process.
2 Specifically, Instagram sent a response to me stating that it sent an email to
3 “s*****@h*****.com” that contained the confirmation code I needed to access the
4 account.

5 77. On October 11, 2022, I asked Angelone to identify this partial email
6 address that was provided. A true and correct copy of the email thread between
7 Angelone and me is attached hereto as **Exhibit 28**. In response, Angelone told me by
8 email he was unable to identify this email address. (*Id.* at p. 28.4.) In an email dated
9 October 11, 2022, Angelone claimed he had not logged into the Instagram account
10 since providing account credentials on September 30, 2022, and further claimed that
11 on October 11, 2022, he received a similar verification email sending a confirmation
12 code to the same unknown email. (*Id.* at p. 28.2.)

13 78. Angelone claimed in a conversation with me on October 13, 2022,
14 memorialized via email, that he received alert emails to his office@aone.la email
15 account that there had been logins to this Instagram account. A true and correct copy
16 of this email is attached hereto as **Exhibit 29**. Though his accessible email was
17 connected to this account, albeit apparently not the one used as the verification email
18 for the confirmation code for this account, he claimed he was unable to access or
19 change the verification email address receiving the confirmation code in order to
20 permit access. In this manner, providing a valid username and password did not
21 actually result in successful access to the account. Accordingly, Angelone never
22 provided the transfer of this account as required by the Preliminary Injunction.

23 79. Despite Angelone’s lack of compliance, HEFG was ultimately able to
24 work through separate channels at Instagram to recover this account.

25 **FTI’S FEES AND COSTS RELATED TO PRELIMINARY INJUNCTION**
26 **AND INVESTIGATIONS**

27 80. As described more fully in paragraphs 1-79 above, beginning on or about
28 October 3, 2022, I and FTI have worked with Plaintiffs and Plaintiffs’ counsel to: (1)

1 review the Preliminary Injunction; (2) communicate with R. Taylor, HEFG
2 representatives, legal counsel, and Angelone to understand context and ascertain
3 status; (3) facilitate the transfer of the assets described in the Preliminary Injunction;
4 (4) follow-up on assets that Angelone did not timely transfer; (5) conduct follow-up
5 investigations concerning registration and the status of the Nine Icelandic Domains
6 and social media accounts; (6) attempt recovery of HEFG's Google Workspace
7 account; (7) work with Plaintiffs' counsel in preparing subpoenas to internet service
8 providers and hosts; (8) review the returns from the providers and hosts, in particular
9 Google, Twitter, Instagram, Charter, and Namecheap; and (9) prepare a report of my
10 findings for counsel and Plaintiffs.

11 81. I was assisted by Tracy Wilson, Senior Managing Director of FTI, and
12 Chris Pluhar, Senior Director of FTI. True and correct copies of the FTI profiles for
13 Ms. Wilson and Mr. Pluhar are attached hereto as **Exhibits 30** and **31**, respectively.
14 From October 3, 2022, through January 2024, FTI's cybersecurity team spent a total
15 of 114.1 hours conducting its work and billed \$84,034.35 to Plaintiffs.

16 I declare under penalty of perjury under the laws of the State of California and
17 United States of America that the foregoing is true and correct.

18 Executed this 5th day of February 2024, at Newport Beach, California.

19
20 /s/ Erin Burke

21 Erin Burke
22
23
24
25
26
27
28

